

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

In re:)	
)	
ROBERT L. PYLES,)	Case No. 13-10044-JKC-7
)	
Debtor.)	
_____)	
)	
ROBERT L. PYLES,)	
)	
Plaintiff,)	
)	
v.)	Adv. Proc. No. 14-50070
)	
VERIZON WIRELESS,)	
)	
Defendant.)	
_____)	

DECLARATION IN SUPPORT OF MOTION TO DISMISS
(William M. Vermette, Esq.)

THE UNDERSIGNED, William M. Vermette, Esq., Assistant General Counsel, Verizon,
states as follows:

1. My name is William M. Vermette. I am over eighteen (18) years of age and am competent to testify to the contents of this Declaration based upon my own personal knowledge of the facts and circumstances set forth herein.

2. At all times relevant to the representations made in this Declaration, I was employed by Verizon Communications Inc.

3. My current title is: Assistant General Counsel.

4. In the above-captioned adversary proceeding, Plaintiff Robert L. Pyles has sued “Verizon Wireless, a corporation.”

5. Verizon Wireless Inc is an indirect wholly-owned subsidiary of Verizon Communications Inc.

6. I am familiar with the services provided by various Verizon entities. In particular, I am familiar with the entity that provides wireless telecommunications services to consumers, businesses and governments.

7. The entity that provides wireless telecommunications services to consumers, businesses and governments is Cellco Partnership d/b/a Verizon Wireless, not Verizon Wireless Inc.

8. Nor is Verizon Wireless Inc. engaged in the business of collecting debts owed by Cellco Partnership d/b/a Verizon Wireless.

9. In the time period relevant to the above-captioned adversary proceeding, Verizon Communications Inc. owned a controlling 55% interest in Cellco Partnership d/b/a Verizon Wireless and Vodafone Group Plc owned the remaining 45%.

10. This information is publically available. Attached hereto as Exhibit A is an excerpt from the Form 10-K report filed by Verizon Communications Inc. with the Securities and Exchange Commission on February 27, 2014. Page 2 of that report confirms the status of Cellco Partnership d/b/a Verizon Wireless.

11. Verizon Communications Inc. is required to file these reports in the course of its regularly conducted business.

I, William M. Vermette, Esq., declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

/s/ William M. Vermette
William M. Vermette, Esq.

Dated: April 28, 2014